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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINA VERHOEK, an individual.

Plaintiff,

vs.

U.S. BANK NATIONAL
ASSOCIATION, a business entity of
unknown form; U.S. BANK HOME
MORTGAGE, a business entity of
unknown form; and DOES 1-50.

Defendants.

Case No. 14-cv-04821-EMC

[Assigned to the Honorable Edward M. Chen]

**REQUEST AND STIPULATION TO
EXTEND TIME TO FILE FIRST
AMENDED COMPLAINT**

[filed: September 30, 2014]

TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

22 Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home
23 Mortgage) (“US Bank”) filed a motion to dismiss Plaintiff Christina Verhoek
24 (“Verhoek”)’s Complaint. At the hearing on the motion to dismiss held on January
25 29, 2015, the Court and the parties discussed the timeline pled in the Complaint
26 regarding the loan modification submission, trial period plan offer and denial of a
27 permanent modification. The Court granted Verhoek leave to amend the complaint
28 to address some of the issues raised at the hearing. US Bank has subsequently sent

1 Verhoek documents showing what it claims is the true timeline of submissions and
2 indicated its belief that the Complaint contained material misrepresentations in
3 violation of FEDERAL RULE OF CIVIL PROCEDURE, RULE 11(b). Verhoek's counsel
4 needs additional time to review the documents before filing a First Amended
5 Complaint. US Bank and Verhoek have stipulated to extend Verhoek's time to file
6 a First Amended Complaint.

7 The parties therefore stipulate and agree that, with the Court's permission and
8 order, Verhoek's time to file a First Amended Complaint is continued to March 6,
9 2015. US Bank shall have 21 days from the filing of the First Amended Complaint
10 to respond to it, including through a motion to dismiss. US Bank has not waived
11 any objection to the venue or to the jurisdiction of the court over the person of the
12 defendant, or any other challenge to the complaint or other pleadings in this case.

13 DATED: February 25, 2015

14 By /s/ Frederick A. Haist
15 E. SCOTT PALMER
16 FREDERICK A. HAIST
PALMER, LOMBARDI & DONOHUE LLP
Attorneys for US Bank N.A.

17 DATED: February 25, 2015

18 By /s/ Nathan L. Scheg
19 NATHAN L. SCHEG
20 IRONHORSE LAW GROUP, PC
Attorneys for Christina Verhoek

21
22 PURSUANT TO STIPULATION, IT IS SO ORDERED.
23

24
25 DATED: 3/5, 2015

